



David M. Abner  
Senior Litigation Attorney  
Law Department

Ashland Inc.  
P.O. Box 2219  
Columbus, OH 43216  
Tel: 614 790-1556, Fax: 614 790-4268  
dmabner@ashland.com

July 14, 2008

**VIA FEDERAL EXPRESS & E-MAIL @ YAMAMOTO.DEB@EPA.GOV**

Deb Yamamoto, Unit Manager Cleanup Unit #2  
USEPA, Region 10  
1200 Sixth Avenue, Suite 900, M/S ECL-115  
Seattle, Washington 98101

**Re: Portland Harbor Superfund Site**

Dear Ms. Yamamoto:

This letter is to request an extension for Ashland Inc. to respond to USEPA's 104(e) Request for Information relating to the Portland Harbor Superfund Site, issued to Ashland on January 18, 2008.

Through its investigation, Ashland has determined that it has five properties it formerly owned or leased in the current Study Area for the Portland Harbor Site. These locations are :

- 2800 Northwest 31<sup>st</sup> Street, Portland, Oregon
- 6650 North Basin Avenue, Portland, Oregon
- 6000 North Cutter Circle, Portland Oregon
- 3322 N.W. 35<sup>th</sup> Street, Portland, Oregon
- 2308 North Clark Street, Portland, Oregon

As you know, including sub-parts, the 104(e) Request issued for the Portland Harbor Site requires well over 150 separate responses for each location a company has in the Study Area. As part of Ashland's ongoing effort to respond to these requests, Ashland has attempted to locate and/or consult with several dozen current and/or former employees from five different divisions and/or departments in the company; expended over 200 company man-hours to collect and accumulate data, documents and information; and incurred over 240 hours of fees from a consultant in an effort to complete responses for two of Ashland's locations in the Study area. Unfortunately, the responses related to these locations still are not complete.

In an effort to respond to EPA's product related inquiries, Ashland has located and/or collected more than 9,500 records that must be reviewed to determine whether they are responsive to the Portland Harbor 104(e). Of these, more than 3,000 must be retrieved by hand from various electronic storage locations before they can be reviewed for responsiveness. Our IT department has estimated that the mere retrieval of these records could take 200 man-hours to complete. At this time, there is no way estimate how long it will take to review each record

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once it has been retrieved. However, if each record could be reviewed in five minutes, the man hours required to review all of these records would total 250 hours.

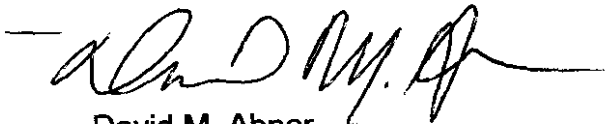
Consequently, a significant extension is necessary for Ashland to continue to complete its due diligence in interviewing former/current Ashland employees, retrieving and reviewing documents in order to provide accurate and truthful responses to the Portland Harbor 104(e). A proposed response schedule is set forth below.

Proposed Response Schedule

|                    |  |
|--------------------|--|
| September 30, 2008 | 2800 Northwest 31 <sup>st</sup> Street, Portland, Oregon<br>6650 North Basin Avenue, Portland, Oregon<br>6000 North Cutter Circle, Portland Oregon |
| October 30, 2008   | 3322 N.W. 35 <sup>th</sup> Street, Portland, Oregon  |
| November 30, 2008  | 2308 North Clark Street, Portland, Oregon  |

Your consideration is greatly appreciated, and we look forward to receiving your response.

Sincerely,



David M. Abner

DMA/mad

cc: Kristine Koch, EPA-ECL (koch.kristine@epa.gov)  
Lori Houck-Cora, EPA-ORC (cora.lori@epa.gov)  
Elizabeth Mckenna, EPA-ORC (mckenna.elizabeth@epa.gov)